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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DENA SNYDER,

Defendant.

Case No. 2:21-CR-00021-GMN-NJK

**Stipulation and Proposed Order to
Modify Conditions of Release and
Continue Revocation Hearing**

It is hereby stipulated and agreed, by and between Jason M. Frierson, United States Attorney, through Jessica Oliva, Assistant United States Attorney; and Rene Valladares, Federal Public Defender, through Joy Chen and Raquel Lazo, Assistant Federal Public Defenders and counsel for Defendant Dena Snyder, that (1) the revocation hearing scheduled for February 15, 2023 at 10:00 a.m., be vacated and set to a date and time convenient to this Court, but no sooner than 28 days; and (2) the Defendant's Conditions of Pre-Hearing Release be modified to add the following condition:

The Defendant is restricted from going to any location where America's Business Concepts LLC and/or any of its successor company(ies)—including but not limited to The Advisors Business Solutions LLC—engage(s) in business, including but not limited to 2670 Chandler Avenue, Las Vegas, Nevada, 89120.

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2 This stipulation is entered into for the following reasons:

3 1. Counsel for the defendant require additional time to review discovery and
4 conduct independent investigation, in order to determine whether there will be a contested
5 evidentiary hearing in this revocation proceeding.

6 2. The defendant is not in custody and does not object to the continuance.

7 3. This is the first request for a continuance of the revocation hearing.

8 4. The IRS began accepting individual tax returns for the 2022 tax year on
9 January 23, 2023. The deadline to file a 2022 tax return or to request an extension is April
10 18, 2023. The parties recognize that it is thus currently peak tax season and will continue to
11 be so until April 18, 2023.

12 5. The defendant is accused of violating the terms of her supervised release by
13 engaging in tax preparation services during the 2022 calendar year at the tax return
14 preparation company, America's Business Concepts, LLC ("ABC"). ECF No. 34.

15 6. On or about January 11, 2023, a company named The Advisors Business
16 Solutions LLC was registered with the Nevada Secretary of State. According to the
17 Defendant, this is the successor company to ABC. According to the Defendant, this
18 successor company continues to offer tax preparation services at the same location as ABC
19 at 2670 Chandler Avenue in Las Vegas, Nevada.

20 7. The defendant is prohibited from engaging in employment in the field of tax
21 preparation services as a condition of her pre-hearing bond. ECF No. 42 at 5. To the best of
22 the parties' knowledge, the defendant has been compliant with this condition while on
23 pretrial release, but the parties agree to the additional modification as an added precaution.
24

3 9. Probation takes no position regarding this additional condition of pre-hearing
4 release.

10. Accordingly, the parties agree that the additional condition prohibiting the defendant from going to the business location for America's Business Concepts LLC and any successor company(ies), including The Advisors Business Solutions LLC, is an appropriate and necessary modification to the Defendant's Conditions of Release under 18 U.S.C. § 3145(a).

11 DATED this 14 day of February, 2023.

12 || Respectfully submitted,

13 | RENE VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Joy Chen

/s/ Jessica Oliva

15	/s/ <i>Raquel Lazo</i>
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JESSICA OLIVA

JOY CHEN

Assistant United States Attorney

16 RAQUEL LAZO

Assistant Federal Public Defenders

17 Counsel for Defendant

Dena Snyder

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:21-CR-00021-GMN-NJK

Plaintiff,

v.

DENA SNYDER,

Defendant.

**[Proposed] Order Granting Stipulation to Modify Conditions of Release and Continue
Revocation Hearing**

FINDINGS OF FACT

Based on the parties' stipulation to continue the revocation hearing date and modify the conditions of pre-hearing release, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant require additional time to review discovery and conduct independent investigation, in order to determine whether there will be a contested evidentiary hearing in this revocation proceeding.

2. The defendant is not in custody and does not object to the continuance.

3. This is the first request for a continuance of the revocation hearing.

4. The IRS began accepting individual tax returns for the 2022 tax year on January 23, 2023. The deadline to file a 2022 tax return or to request an extension is April 18, 2023. The parties recognize that it is thus currently peak tax season and will continue to be so until April 18, 2023.

1 5. The defendant is accused of violating the terms of her supervised release by
2 engaging in tax preparation services during the 2022 calendar year at the tax return
3 preparation company, America's Business Concepts, LLC ("ABC"). ECF No. 34.

4 6. On or about January 11, 2023, a company named The Advisors Business
5 Solutions LLC was registered with the Nevada Secretary of State. According to the
6 Defendant, this is the successor company to ABC. According to the Defendant, this
7 successor company continues to offer tax preparation services at the same location as ABC
8 at 2670 Chandler Avenue in Las Vegas, Nevada.

9 7. The defendant is prohibited from engaging in employment in the field of tax
10 preparation services as a condition of her pre-hearing bond. ECF No. 42 at 5. To the best of
11 the parties' knowledge, the defendant has been compliant with this condition while on
12 pretrial release, but the parties agree to the additional modification as an added precaution.

13 8. The defendant states she is now working from home, and thus does not need
14 to go to 2670 Chandler Avenue for purposes of work.

15 9. Probation takes no position regarding this additional condition of pre-hearing
16 release.

17 10. The following additional condition of pre-hearing release is an appropriate
18 and necessary modification to the Defendant's Conditions of Release under 18 U.S.C.
19 § 3145(a):

20 The Defendant is restricted from going to any location where
21 America's Business Concepts LLC and/or any of its successor
22 company(ies)—including but not limited to The Advisors Business
23 Solutions LLC—engage(s) in business, including but not limited to
24 2670 Chandler Avenue, Las Vegas, Nevada, 89120.

ORDER

IT IS HEREBY ORDERED that the revocation currently scheduled for February 15, 2023, at the hour of 10:00 a.m. be continued to March 15, 2023 at the hour of 9:00 AM in Las Vegas Courtroom 7D before Judge Gloria M. Navarro.

IT IS FURTHER ORDERED that the Defendant's Conditions of Pre-Hearing Release are modified to add the following additional condition:

The Defendant is restricted from going to any location where America's Business Concepts LLC and/or any of its successor company(ies)—including but not limited to The Advisors Business Solutions LLC—engage(s) in business, including but not limited to 2670 Chandler Avenue, Las Vegas, Nevada, 89120.

DATED this 14 day of February, 2023.



HONORABLE GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE